

Exhibit 13

<p style="text-align: right;">Page 229</p> <p>UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS -----x JOHN BRADLEY, Plaintiff, v. Civil Action No. 1:13-cv-12927-RGS TIMOTHY J. CRUZ (Individually), MICHAEL HORAN (Individually), FRANK J. MIDDLETON (Individually), And OFFICE OF THE DISTRICT ATTORNEY FOR PLYMOUTH COUNTY, Defendants. -----x CONTINUED DEPOSITION of TIMOTHY CRUZ, a witness called by counsel for the Plaintiff, taken pursuant to the Federal Rules of Civil Procedure before Julie A. Mercier, Registered Professional Reporter and Notary Public in and for the Commonwealth of Massachusetts, at the offices of Sinsheimer & Associates, 92 State Street, 9th Floor, Boston, Massachusetts, on Monday, August 3, 2015, commencing at 12:25 p.m.</p>	<p style="text-align: right;">Page 231</p> <p>1 I N D E X 2 Deposition of: Direct Cross Redirect Recross 3 TIMOTHY CRUZ 4 By Mr. Sinsheimer 232 5 6 7 E X H I B I T S 8 No. Page 9 Exhibit 8 Affidavit 263 10 Exhibit 9 Affidavit 267 11 Exhibit 10 Order 7/22/15 278 12 Exhibit 11 Speech 358 13 Exhibit 12 Multiple pages of e-mails 386 14 Exhibit 13 Organizational Responsibilities Chart 2011 399 15 16 Exhibit 14 Organizational Responsibilities Chart 2010 403 17 Exhibit 15 Organizational Responsibilities 3/27/12 404 18 19 20 21 22 23 24</p>
<p style="text-align: right;">Page 230</p> <p>1 APPEARANCES: 2 3 SINSHEIMER & ASSOCIATES 4 By Robert S. Sinsheimer, Esq. 5 By Wesley Stoker, Esq. 6 92 State Street, 9th Floor 7 Boston, Massachusetts 02109 8 (617) 722-9954 9 For the Plaintiff. 10 11 MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO PC 12 By Bret A. Cohen, Esq. 13 One Financial Center 14 Boston, Massachusetts 02111 15 (617) 542-6000 16 For the Defendants. 17 18 ALSO PRESENT: John Bradley 19 20 21 22 23 24</p>	<p style="text-align: right;">Page 232</p> <p>1 P R O C E E D I N G S 2 TIMOTHY CRUZ, 3 4 a witness called for examination by counsel for 5 the Plaintiff, being satisfactorily identified by 6 the production of his driver's license, being 7 first duly sworn, was examined and testified as 8 follows: 9 10 DIRECT EXAMINATION 11 BY MR. SINSHEIMER: 12 Q. State your full name, please. 13 A. Timothy J. Cruz. 14 Q. Mr. Cruz, you're aware, of course, that 15 this is the continuation of a deposition you 16 commenced on March 25, 2015? 17 A. Yes. 18 Q. You're represented by Mr. Cohen? 19 A. Yes. 20 MR. SINSHEIMER: Same stipulations, 21 Mr. Cohen, or continuing stipulations? 22 MR. COHEN: Yes. 23 Q. And, Mr. Cruz, sometime between the 24 taking of the first day of your deposition on</p>

<p style="text-align: right;">Page 233</p> <p>1 March 25, 2015 and today, a transcript was made. 2 Were you aware of that? 3 A. Of my testimony? 4 Q. Yes. 5 A. Yes. 6 Q. Have you read a copy of your 7 transcript? 8 A. I went through it. 9 Q. Did you fill out an errata sheet 10 formally? 11 A. I did not. 12 Q. Is there something, anything at all, in 13 your testimony that from memory you would sit here 14 today and say, "I made a mistake I want to 15 correct"? 16 A. Not that I can think of. 17 Q. So if I would ask the flip side, you'd 18 stand by that testimony upon reflection as your 19 positions in this case and your answers to my 20 questions -- 21 A. I believe. 22 Q. -- as of March 25, 2015 -- 23 A. I believe so. 24 Q. -- as of today?</p>	<p style="text-align: right;">Page 235</p> <p>1 resignation/termination. 2 Q. In other words, the day that Mr. Horan 3 went to Mr. Bradley and said, "I'm going to ask 4 you to leave," you told Mr. Horan that you'd made 5 a determination to terminate John Bradley? 6 A. That's -- no. 7 Q. My question is really more about the 8 document than it is about -- we're going to get 9 into the termination itself. 10 A. Okay. 11 Q. If I understood your testimony last 12 time, you got this document? 13 A. Yes. 14 Q. And you at that point made a decision, 15 John is not going to work here anymore? 16 A. Yes. 17 Q. But the actual termination date was 18 almost a year later -- 11 months -- 10 months and 19 2 weeks later or so? 20 A. Ballpark. 21 Q. And my question is, who in that 22 intervening period of time, if anyone, did you 23 tell that you had decided to terminate John based 24 specifically upon your receipt of this e-mail?</p>
<p style="text-align: right;">Page 234</p> <p>1 A. I believe so. 2 Q. One of the things I believe you said 3 was that you had determined that you were going to 4 terminate Mr. Bradley almost as soon as you 5 received this memorandum that we marked at the 6 deposition, Exhibit 6. Do you recall that 7 testimony? 8 A. I believe so. 9 Q. Well, is that the truth, that's when 10 you decided to terminate John Bradley? 11 A. Yeah. Yes. 12 Q. And at any time prior to the actual 13 termination, did you tell anybody that you've made 14 a determination to terminate Mr. Bradley based 15 specifically on your receipt of Exhibit 6? 16 A. I'm sorry. Could you say that again? 17 Q. Sure. Did you tell anybody that you 18 decided to fire John Bradley as a result of your 19 receipt of that document which is marked 20 Exhibit 6? 21 MR. COHEN: Objection. 22 A. I believe I told Mike Horan. 23 Q. When did you tell Mr. Horan? 24 A. It would have been the day of the</p>	<p style="text-align: right;">Page 236</p> <p>1 A. My wife, I believe. 2 Q. Okay. That's fine. 3 A. And, I believe, Mike Horan. 4 Q. When did you tell Mr. Horan? 5 A. I believe it was the day of the 6 termination -- 7 Q. The actual date -- 8 A. -- September 28th or something like 9 that. 10 Q. Why don't we jump to that. 11 So on September 28, 2012, Mr. Bradley 12 was terminated? 13 A. Yes. 14 Q. And the person that actually 15 communicated that to Mr. Bradley was Mr. Horan? 16 A. Yes. 17 Q. So I gather you had spoken to Mr. Horan 18 and instructed him to take that action? 19 A. If he didn't resign, yes. 20 Q. All right. Tell me what you said to 21 Mr. Horan. 22 A. Best of my memory is I said, "John had 23 agreed to leave, but now the case is over, but if 24 he doesn't leave, he can't work here anymore."</p>